

FOIA # EPA-R2-2016-007968

We did not find any (RCRA) hazardous waste information for the company name National Spray Can Filling Industries, Company No. 4679 in New Jersey.

We have one document for Contact Industries Div. of Safeguard Chemical Corp., Elizabeth, New Jersey which may be considered confidential. We recommend that you first review the documents that we have and that are uploaded in FOIAonline. If after reviewing the documents and you still have an interest in pursuing the regulatory process to request disclosure of the confidential document, please inform Mr. David Abrines at (212) 637-3043 and/or by email to Abrines.david@epa.gov.

Confidential (Non-CBI) Document Substitution Page

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Facility Name: Contact Industries Div. of Safeguard
chemical Corp.

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641 Dowd Avenue, Elizabeth, New Jersey 07201

(201) 351-5900 • (800) 526-6832

CERTIFIED MAIL# 7003 1680 0007 4753 9231
RETURN RECEIPT REQUIRED

June 8, 2004

Miss Marianna Dominguez
Environmental Engineer
Div. of Enforcement & Compliance Assistance
USEPA, Region 2
290 Broadway, 22 Floor
New York, NY 10007-1866

Re: Notice of Violation
RCB ID# 94-0000-3008-61

Dear Miss Dominguez:

This is in response to the Notice of Violation, which was received on May 10, 2004, resulting from the inspection performed on April 15, 2004 and cited five (5) violations.

1. We have reiterated the necessity to have the date of accumulation clearly marked on each drum with both of the employees who are responsible for the storage of the containers of hazardous waste. I also bear the blame for not having noticed the missing dates during my visual inspections of the Waste Storage Area.

2. Enclosed please find an addenda to our contingency plan titled "Building Safeguards". We updated the plan with emphasis on the emergency equipment in our gas room, though the emergency equipment was installed from the very beginning of the gas room installation.

3. A training program for hazardous waste handling has been established and attached. An annual training of those employees who handle hazardous waste is scheduled. We will show the film entitled "Disposal of Hazardous Waste" which was obtained through Long Island Productions.

4&5. The hazardous waste storage area has been moved from the outside area to the inside of building where a telephone is within 25 feet and an air horn is located less than 10 feet away.

MEMBERS OF



Marianna Dominguez
Notice of Violation
Page 2 of 2

The new waste storage area is located just outside of the mixing room near the shipping/receiving area. (Please refer to enclosed drawing.)

Should you have any further questions, please don't hesitate to let us know.

Very sincerely yours,

A handwritten signature in dark ink, appearing to read "Louis J. Van Bergen", with a long horizontal flourish extending to the right.

Louis J. Van Bergen
Plant Manager

Encl.

cc: Honglie Hu, Technical Director
Edward Piranian, President

file: wpdocs\violation.epa

Updated: June 2004

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

In the event of an emergency, which would require a plant evacuation, the following plan should be put into effect:

Sound Air Horn Alarm (3 short blasts) One located by the overhead door near Mouse Trap Line; one located by the compounding entrance door.

Alternate is paging system: repeat

"PLANT EMERGENCY – EVACUATE BUILDING".

PROCEDURE:

COMPOUNDING

- Close all valves and turn off equipment.
Exit through side door.

GAS ROOM

- Shut down gas room; shut off propellant pumps.
Shut off equipment. Exit premises through
backyard.

LINE MECHANIC

- Shut off valves and equipment in your area.
Evacuate people through side door (time clock area)
or through the office area.

ADRIAN

- Shut off valves and machines in your area. Evacuate
people through the side door (time clock area) or
through office area.

CARMEN

- Notify someone in the front office of emergency so
they can call Fire, Police etc. - **"911"**
Check locker rooms to make sure everyone has left.
Take attendance to account for all employees in
parking lot.

RAYMOND

- Leave through shipping door – await arrival of
Emergency Personnel and direct them to the
location of the problem.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT'D)

EMERGENCY TEAM – If emergency is fire, report to area and try to extinguish.
IF FIRE IS OUT OF CONTROL. EVACUATE PLANT.

R. Downey (L. Hu or L. Van Bergen) will direct Fire, Police, and /or Emergency Personnel to the location of the problem. L. Hu and/or L. Van Bergen will advise as to the current status.

If there is no spillage or discharge of hazardous material that is hazardous to health, follow the above plan. The "**EMERGENCY TEAM**" will report to spill sight.

IF SPILL IS CONTROLLABLE, USE SPEEDI DRY OR CEMENT TO CONTAIN SPILL.

IF THE SPILL IS NOT CONTROLLABLE, OR CLEANUP CANNOT BE HANDLED BY US, CALL – I.T.C. (INTERNATIONAL TECHNOLOGY CORPORATION.)

24 – HOUR EMERGENCY RESPONSE 1-800-535-5053

Tell them of the type and size of spill. They will respond.

IF SPILL HAS CONTAMINATED OR MIGHT CONTAMINATE GROUND OR WATER OR AIR, CALL D.E.P. Hot Line 1-609-292-7172.

EMERGENCY RESPONSE TEAM

R. Downey	A. Garcia	K. Kemper	J. Pena	C. Sanchez
W. Fraser	L. Hu	D. Pastrana	C. Rodriguez	L. Van Bergen

Trinitas Hospital has a list of our Material Safety Data Sheet (MSDS) 908-994-5000

To summon an ambulance – 911

N.J. Poison Control Center – 1-800-222-1222

Elizabeth Office of Emergency Management (Elizabeth Police Department)
908-558-2020

Union County Division of Emergency Management 908-654-9800 (24 Hour Service)
MSDS File on hand in Westfield Office.

EMERGENCY EQUIPMENT

- A) Fire extinguishers are located throughout the building. Their locations are marked on the walls and "I" Beams with signs. Refer to floor plans posted throughout the building for exact locations. The large extinguisher on wheels is located in the Mixing (Compounding) Room, and can be moved quickly to where it is needed.
- B) Supplies of Speedi – Dry and Cement are available for containing spills in two locations:
 - 1) East side of building – Adjacent to maintenance shop and boiler room.
 - 2) West side of building – in the shipping department, next to the mixing (compounding) room.
- C) Gloves and safety glasses, and dust masks are available from the production floor Supervisor's desk. Additional supplies of these items are kept in the supply room in the office.
- D) The mixers have their own respirators. Replacement cartridges are stored in the metal cabinet in the Plant Managers office, which is not locked.
- E) Shovels and brooms are in the maintenance shop, while additional brooms are kept in the supply room in the office, as is the dry/wet vacuum.

CLEAN – UP

In the event of a spill or fire, the materials used to clean-up must be cleaned and returned to storage. Any waste resulting from the clean-up must be drummed, and labeled. The Plant Manager will arrange for disposal. The waste may involve liquids, solids, and/or semi-solids such as Speedi – Dry and cement used to absorb liquids. Any waste resulting from such a clean-up will be put into open head drums, which are stored outside the building.

INCIDENT REVIEW

Once it is determined that the situation is under control, an investigation will take place to determine the cause of the event.

Before resuming operations, clearance must be gotten from the agencies that were involved in helping to alleviate the problem. A comprehensive review must include contact with the local Police and Fire Departments, and the D.E.P., as well as any others whose aid is required such as Sprinkler Services, Electrical Contractors, etc...

A final written report will be issued within five days, with additional information being written up as received after the initial report is issued.

BUILDING SAFEGUARDS

The entire building is protected by a water sprinkler system that is activated by fire. The sprinkler system is maintained and inspected by Absolute Protective Systems, Inc.

The Mixing Rooms (2) are sprinklered and all electric fixtures are explosion proof. The doorways are diked to prevent the flow of any materials that might spill to the outside of the building.

The Gas House is sprinklered, and all electric fixtures are explosion proof. It is also equipped with a MSA combustible sensors device. If the sensors detect that the gas level in the room is rising, a number of things happen simultaneously:

1. The pumps bringing propellant from the storage tanks to the gassers are shut off,
2. The gassers that put the propellant into the cans are shut off,
3. The conveyors that move the cans into and out of the gassers are shut off, as well as the conveyors in the main building,
4. The exhaust fan in the gas house is switched from normal to high speed to help change the air in the room,
5. A horn sounds in the main building to alert everyone that the line has shut down. It will continue to sound until manually re-set.
6. Once the levels of combustibles has returned to normal levels, the sensor must be reset manually to allow the equipment to be re-started. This must also be done manually.

In case a problem other than the buildup of combustible gas should occur in the gas house – a broken pipe, a leak, or some other type of problem – all of the equipment in the gas house can be shut down as described above, by pushing the “Panic Button” to the right of the “Exit” door. This will shut down all of the pumps and machines and sound the alarm inside the building.

The system is maintained and inspected under an agreement we have with Automated Control Technologies, Inc.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT'D)

****EMERGENCY COORDINATORS****

<u>NAME:</u>	<u>DAYTIME ADDRESS & PHONE NUMBERS</u>	<u>AFTER HOURS ADDRESS & PHONE NUMBERS</u>
(PRIMARY) L.Hu	Contact Industries 641 Dowd Avenue Elizabeth, NJ 07201 908-351-5900	141-16 25 Road #6B Flushing, NY 11354 718-460-1948
L. Van Bergen	Contact Industries 641 Dowd Avenue Elizabeth, NJ 07201 908-351-5900	54 Surrey Road Clark, NJ 07066 732-381-6980
A. Garcia	Contact Industries 641 Dowd Avenue Elizabeth, NJ 07201 908-351-5900	313 Jefferon Avenue Elizabeth, NJ 07206 908-313-2792
B. Scott	Contact Industries 641 Dowd Avenue Elizabeth, NJ 07201 908-351-5900	117 Maple Avenue Linden, NJ 07036 908-587-0981
P. Piranian Sr.	Safeguard Chemical Corp. 411 Wales Avenue Bronx, NY 10454 718-585-3170	43 Rockwood Road Plandome Maner, NY 11030 516-627-6854
E. Piranian	Safeguard Chemical Corp. 411 Wales Avenue Bronx, NY 10454 718-585-3170	220 Crab apple Road Manhasset, NY 11030 516-627-6565

STORAGE TANKS

<u>CONTENTS</u>	<u>CAPACITY</u>
1. Tank is out of service (1)	Empty (2,000 Gals.)
2. Tanks are out of service (6)	Empty (500 Gals.)
3. Carbon Dioxide	UN1287 12,000 LBS.
4. Exxsol D-110	- 3,000 Gals.
5. Tank is out of service	Empty -
6. Tank is out of service	Empty (900 Gals.)
11. Odorless Mineral Spirits (2)	UN1268 2,000 Gals. Ea.
12. Isopropyl Alcohol (2)	UN1219 1,000 Gals. Ea.
13. Isopar "C" (2)	UN1268 1,000 Gals. Ea.
14. Perc	UN1097 2,000 Gals.
15. Tanks are out of service (2)	Empty (1,000 Gals. Ea.)
16. Trichloroethylene (2)	UN1230 1,000 Gals. Ea.
18. Isobutane/Propane – A-46 (3)	UN1075 1,800 Gals. Ea.
19. Isobutane/Propane – A-70 (6)	UN1075 1,000 Gals. Ea.

Note: Tank #17- Dismantled and scrapped in 1998.

Tanks # 7,8,9,and 10 - Dismantled and scrapped in 2002.

Tanks # 18-B and 18-E were put out of service on 3/9/04.



INDUSTRIES, INC.

641 Dowd Avenue, Elizabeth, New Jersey 07201

(201) 351-5900 • (800) 526-6832

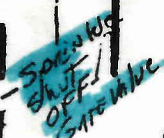
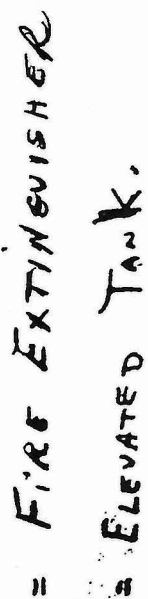
Hazardous Waste Disposal

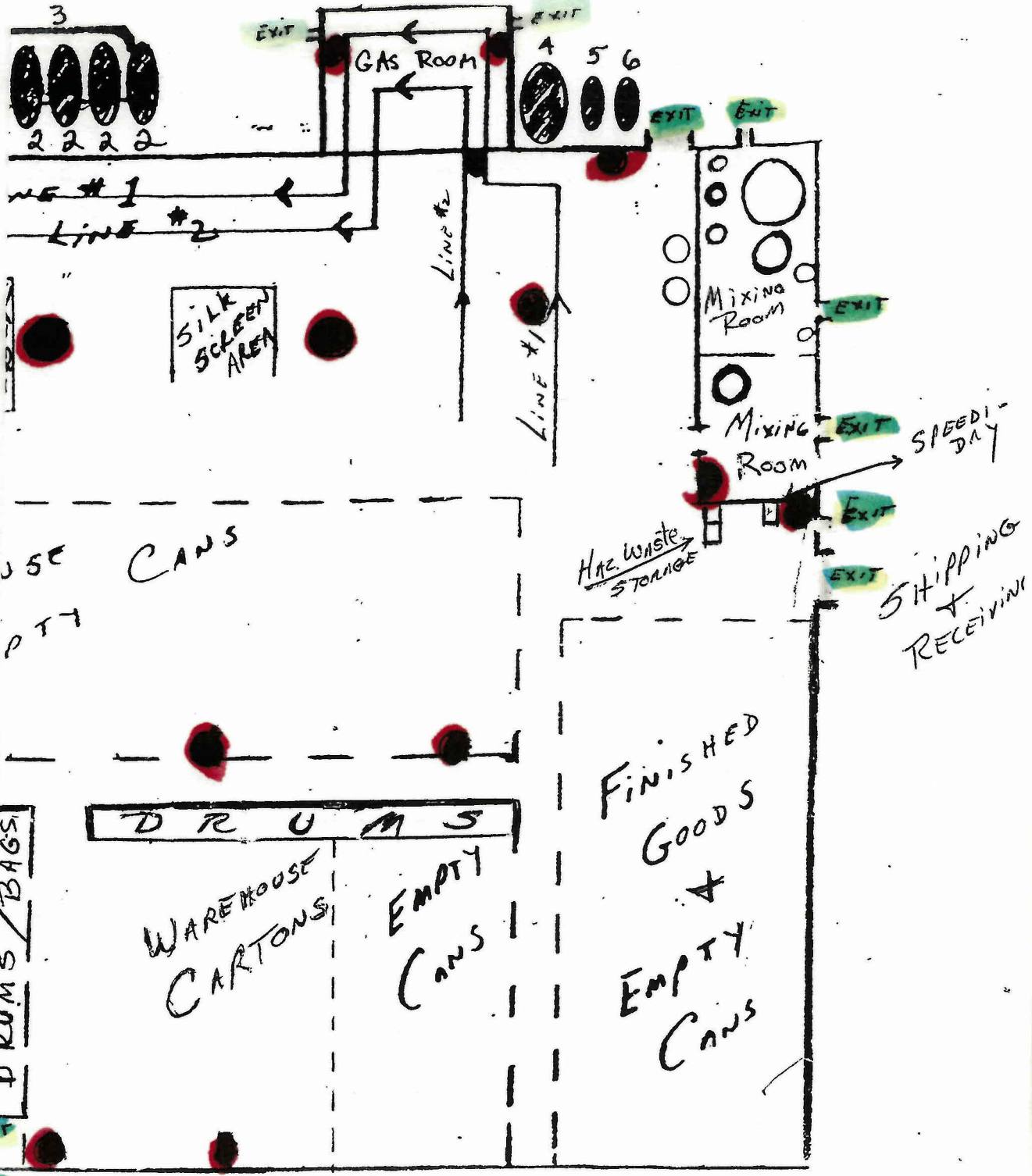
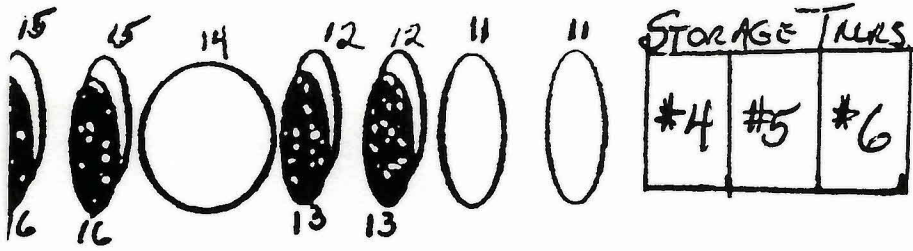
- Purpose: Collect waste from manufacturing process.
- Sources: 1. Clean-up of production line and product tanks.
2. Un-salable cans.
- Storage: Hazardous waste will be stored in 55-Gallon steel closed head drums.
- Handling: There are two collection points in the plant. One is in between the two mixing rooms. The other is between the filling machines on the two production lines.
- Each drum is to contain "Hazardous Waste" label to identify the contents.
- Full drums are moved to the waste storage area, and the date of transfer is noted on the label.
- Processing: Within each 90-day period, the accumulated drums are sent off site for disposal through the facilities of a hazardous waste disposal contractor. We currently are doing business with the Safety Kleen Corporation, and Fisher Industrial Services.

File: wpdocs\waste2.dsp

MEMBERS OF







DATE: 04/14/04
TIME: 14:34:12

HAZARDOUS WASTE MANIFEST SYSTEM
GENERATORS / MANIFESTS

SCREEN: HWS1760
TERMINAL: @558

EPA ID: NJD002052017

COMPANY NAME AND ADDRESS
CONTRACT INDUSTRIES INC
641 DOWD AVE
ELIZABETH NJ 07201

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1	UNIT 1	QTY 1	MORE
0001	06-07-2001	AL00122147	ALD981020894	D001	G	1375	
0002	09-27-2001	AL00072675	ALD981020894	D001	G	1045	
0003	12-17-2001	AL00129900	ALD981020894	D001	G	660	
0004	03-20-2002	AL00138416	ALD981020894	D001	G	715	
0005	04-24-2002	NJA4034528	KYD053348108	F002	G	660	
0006	06-04-2002	NJA4028752	KYD053348108	F002	G	550	
0007	09-17-2002	NJA4028230	NJD002182897	F002	G	850	
0008	01-21-2003	NJA4055902	NJD002182897	F002	G	1155	

SELECT LINE NO 0

PF KEYS: PF3=MAIN PF5=CLEAR PF7=PREVIOUS PF8=NEXT PAGE PF10=END PROGRAM

Leo Hu -

THERE ARE NO MORE RECORDS

DATE: 04/14/04

TIME: 14:34:12

HAZARDOUS WASTE MANIFEST SYSTEM
GENERATORS / MANIFESTS

SCREEN: HWS1760

TERMINAL: @558

EPA ID: NJD002052017

COMPANY NAME AND ADDRESS
CONTRACT INDUSTRIES INC
641 DOWD AVE
ELIZABETH NJ 07201

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1	UNIT 1	QTY 1	MORE
0009	04-02-2003	NJA4051611	NJD002182897	F002	G	1485	
0010	07-17-2003	NJA4104310	NJD002182897	F002	G	2805	
0011	10-15-2003	NJA5088106	NJD002182897	F002	G	1045	
0012	01-26-2004	NJA5083300	NJD002182897	F002	G	495	

SELECT LINE NO 0

PF KEYS: PF3=MAIN PF5=CLEAR PF7=PREVIOUS PF8=NEXT PAGE PF10=END PROGRAM
